



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

OCT 04 2016

CERTIFIED MAIL: RETURN RECEIPT REQUESTED, #9590 9401 0007 5205 8869 63

GENERAL NOTICE LETTER

URGENT LEGAL MATTER - PROMPT REPLY NECESSARY

Stuart Transportation Company
5454 Wisconsin Avenue, Suite 1600
Chevy Chase, Maryland 20815



**Re: SBA Shipyard Superfund Site, Jennings, Jefferson Davis Parish, Louisiana;
CERCLIS #: LAD008434185; General Notice Letter**

Dear Madam/Sir:

The purpose of this letter is to provide Stuart Transportation Company (hereinafter is referred to as "Stuart Transportation Company" "you" or "your"), with written notice of your potential liability at the SBA Shipyard Superfund Site ("Site") located in Jennings, Jefferson Davis Parish, Louisiana. Information available to the U.S. Environmental Protection Agency ("EPA" or the "Agency") indicates that Stuart Transportation Company may be responsible for the cleanup or costs of cleanup of the contamination found at the Site under the Comprehensive Environmental Response, Liability, and Compensation Act ("CERCLA").

Under CERCLA, the EPA is responsible for responding to the release or threat of release of hazardous substances, pollutants or contaminants into the environment – that is, for stopping further contamination from occurring and for cleaning up or otherwise addressing any contamination that has already occurred. The EPA has documented that such a release or threat or release has occurred at the SBA Shipyard Superfund Site. The EPA has spent public funds to investigate and control releases of hazardous substances or potential releases of hazardous substances at the Site.

Explanation of Potential Liability

Under Sections 106(a) and 107(a) of CERCLA, 42 U.S.C. §§ 9606(a) and 9607(a), potentially responsible parties ("PRPs") may be required to perform cleanup actions to protect the public health and welfare or the environment. PRPs may also be responsible for costs incurred by the EPA in cleaning up the Site. PRPs include current and former owners and operators of the Site, as well as persons who sent or transported hazardous substances to the Site for disposal or treatment or who arranged for the disposal or treatment of hazardous substances at the Site.

Based on the information collected, the EPA believes that Stuart Transportation Company may be liable under Section 107(a) of CERCLA, with respect to the SBA Shipyard Superfund Site, as an arranger, who by contract or agreement, arranged for the disposal, treatment, or transportation of hazardous substances at the Site.

Site History

The Site is situated on approximately 98 acres of land located in a rural-industrial area at 9040 Castex Landing Road, Jennings, Jefferson Davis Parish, Louisiana 70546. The Site is within Section 19 of Range 2W, Township 10S and is located at the end of Louisiana Highway 3166) which is on the west bank of the Mermentau River. The Site is approximately four miles southeast of downtown Jennings and two miles southwest of the village of Mermentau. The Site is bordered to the north by residents, south and west by wetlands, and east by the Mermentau River and wetlands.

The Site primarily consists of two separately-owned parcels of property, one southern and one northern. The southern and northern properties are generally divided by a property line that runs just north of the large barge slip. Suzanne Smailhall Cornelius, (heir of Louis Smailhall, principal of SBA Shipyards, Inc.) and SBA Shipyards, Inc. (now inactive) own the southern property, which historically was operated as a barge cleaning operation. Bunge Street Properties, LLC, f/k/a Leevac Shipyards, Inc., owns the northern property, which historically was operated as a vessel construction and repair operation.

SBA Shipyards, Inc. ("SBA") began operations at the Site on about 1965. Initially, it performed vessel construction and repair operations on what is now the northern parcel. In the 1970s, SBA constructed the graving dock on the northern parcel and dredged the barge slip and constructed the barge cleaning facility on what is now the southern parcel. Leevac Shipyards, Inc. ("Leevac") entered into a lease with option to purchase for the northern vessel construction and repair facility with SBA in 1993. Leevac operated vessel construction and repair operations on the northern parcel beginning in 1993. Leevac then exercised its option to purchase in 1998 and acquired the northern parcel at that time and continued its operations. SBA continued to operate its barge cleaning operations on the southern parcel up until approximately 2006, when Mr. Smailhall died.

Vessel construction and repair utilized two launch slips with on-land rails to haul and launch vessels and eventually a graving dock with a moving gate where a vessel could enter and the dock de-watered to allow construction and repairs on dry land. Both SBA and Leevac activities included sandblasting, cutting and painting, as well as fabricating and repairing vessels. Barge cleaning operations were conducted by SBA only on the southern parcel. SBA converted a small barge placed on land adjacent to the barge slip into its "boiler barge," which it used to generate steam for use in cleaning barges and it also served as the barge cleaning control room.

SBA cleaned barges and other vessels that had contained as last cargos a variety of materials, including, but not limited to: acrylates, asphalt, carbon tetrachloride, coal tar, coke oven tar, carbon black, carbon oil, , caustic soda, creosote, cumene, black oil and black oil slop, bunker crude, diesel fuel, heavy grease, waste water, ethyl acrylates, kerosene, lube oil, methanol, number 6 oil , rust, scale, styrene, sour gas oil, soy bean oil, sulphuric acid, tallow, and vinyl acetate.

SBA used a large partially buried barge, as well as above-grade tanks constructed from cut-up barges, to store liquids, sludges, solids and other materials during the barge cleaning process. SBA also constructed and used an unlined surface impoundment called the Oil Pit to store liquids, sludges, solids and other materials. Aside from the Oil Pit, SBA used three other unlined surface impoundments, called Water Pits 1, 2 and 3, to receive wastewater, sludges and solids from the barge cleaning process.

In December 10, 2002, EPA entered into an Order and Agreement for Interim Measures/Removal Action (IM/RA) of Hazardous/Principal Threat Wastes at SBA Shipyards, Inc., Docket No. RCRA-6-2002-0908, pursuant to RCRA Section 3008(h) ("2002 Order/Agreement") with SBA and SSIC Remediation, LLC ("SSIC"), an entity formed by certain former customers of SBA's barge cleaning operations to conduct this work. Interim removal activities were conducted from March 2001 through January 2005 under the 2002 Order/Agreement. Interim removal activities consisted of the removing, solidifying, and recycling and/or disposing off-site the waste in the Oil Pit and Water Pit 2 and then over-excavation of the Oil Pit and Water Pit 2; removal and scrapping of above ground storage tanks; draining and refilling of Water Pit 3; removing all pumpable materials from the partially buried barge and disposing those materials off-site, then welding shut all hatches to that barge, and surface scrapping of all visible materials from a former land treatment unit (FLTU). By letter dated February 24, 2006, EPA Region 6's RCRA branch reviewed and approved the completion report of the IM/RA activities and concluded that the completion report fulfilled the 2002 Order/Agreement. The IM/RA, however, was intended as an interim response; hazardous substance remained onsite after the IM/RA.

In October 2012, the U.S. Coast Guard and the LDEQ responded to a reported release at the barge cleaning portion of the Site from an attempt to scrap the "boiler barge" and the partially buried storage barge by parties contracted by the owner of the southern portion of the Site. During 2014 to 2015, EPA conducted a CERCLA emergency removal action and an Oil Pollution Act of 1990 removal action after LDEQ reported barge scrapping activities and releases of visible liquids at the Site.

Between December 2012 and September 2014, EPA conducted a preliminary assessment, site inspection, and expanded site inspection. As part of EPA activities, the Agency conducted sampling activities at the Site. During those site activities, EPA sampling documented releases or threats of releases of hazardous substances in the subsurface and groundwater of the Site, the Mermentau River, and wetlands surrounding the Site. Numerous hazardous substances were identified at the Site including petroleum hydrocarbons, numerous polycyclic aromatic hydrocarbons, dioxins/furans, metals, and volatile organic compounds. Petroleum and non-petroleum substances found at portions of the Site are or were comingled.

Information to Assist You

The EPA would like to encourage communication between you, other PRPs, and EPA at the Site. The EPA is in the process of negotiating a remedial investigation/feasibility study administrative settlement and order on consent ("ASOC") for the Site with some of the potentially responsible parties. If you'd like to discuss the opportunity to join this ongoing settlement, please contact counsel representing the group of potentially responsible parties below within **30 days** of receipt of this Notice Letter:

Michael A. Chernekoff
Partner
Jones Walker LLP
1001 Fannin St., Ste. 2450
Houston, Texas 77002
(713) 437-1827
mchernekoff@joneswalker.com

We encourage you to give this matter your immediate attention and request. The EPA plans to finalize the ASAO after the 30-day response period for this General Notice. If you choose not to join the ongoing settlement discussions or pursue other options to satisfy your potential liability with the EPA, the EPA will evaluate enforcement options, including issuing special notice letters to all potentially liable parties known to the EPA at that time.

Also included in this letter to assist you are: the evidentiary documents as Enclosure A; the Small Business Resource Fact Sheet as Enclosure B, and the parties receiving this letter as Enclosure C.

Financial Concerns/ Ability-to-Pay Settlements

The EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at a site may be substantially limited. In accordance with Section 122(g)(7) of CERCLA, 42 U.S.C. § 9622(g)(7), the EPA will review financial information that you submit in order to determine whether you have an inability or a limited ability to pay response costs incurred at the Site. As part of this review, the EPA will take into consideration your overall financial condition and demonstrable constraints on your ability to raise revenue. Based upon the financial information that you may submit, EPA will determine whether it can qualify for a reduction in the settlement amount and/or an alternative payment method within the meaning of Section 122(g)(7) of CERCLA, 42 U.S.C. § 9622(g)(7).

If you believe that you qualify for a reduction in any settlement amount and/or alternative payment amount under the criteria described in the paragraphs above, please contact Mr. Taltón, at 214-665-7475 for information on "Ability to Pay Settlements." In response, you will receive a package of information about the potential for such settlements and an information request for your relevant financial information, and you will be asked to submit financial records including business federal income tax returns. If the EPA concludes that you have a legitimate inability to pay the full amount of the response costs, the EPA may offer a schedule for payment over time or a reduction in the total amount demanded from you.

Also, please note that because the EPA has a potential claim against you, if your financial status changes in any significant way, e.g., filing for bankruptcy, you must include the EPA as a creditor. The EPA reserves the right to file a proof of claim or an application for reimbursement of administrative expenses.

Resources and Information for Small Businesses

As you may be aware, on January 11, 2002, President Bush signed into law the Superfund Small Business Liability Relief and Brownfields Revitalization Act. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may download a copy of the law at <http://www.gpo.gov/fdsys/pkg/PLAW-107publ118/pdf/PLAW-107publ118.pdf> and review the EPA guidances regarding these exemptions at <http://cfpub.epa.gov/compliance/resources/policies/cleanup/superfund/>.

The EPA has created a number of helpful resources for small businesses. The EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers which offer various forms of resources to small businesses. You may inquire about these resources at <http://www.epa.gov/compliance/compliance-assistance-centers>. In addition, the EPA Small Business Ombudsman may be contacted at <http://www.epa.gov/resources-small-businesses/forms/contact-us-about-resources-small-businesses>. Finally, the EPA has developed a fact sheet about the Small Business Regulatory Enforcement Fairness Act (SBREFA) and information on resources for small businesses, which is enclosed with this letter as Enclosure B and available on the Agency's website at <http://www.epa.gov/compliance/small-business-resources-information-sheet>.

Thank you in advance for your cooperation. We look forward to working closely with you in the future. If you have any questions regarding the notice or any of the documentation included, please contact Mr. Talton at 214-665-7475 or talton.chuck@epa.gov. Questions concerning legal matters should be directed to the EPA site attorney, Ms. I-Jung Chiang, at 214-665-2160 or chiang.i-jung@epa.gov. Thank you for your attention to this matter.

Sincerely yours,



Ben Banipal, P.E., Branch Chief
Technical and Enforcement Branch
Superfund Division

Enclosures:

- A Evidentiary Documents
- B Small Business Resource Fact Sheet
- C Parties Receiving General Notice letter

ENCLOSURE A

**SBA SHIPYARD SUPERFUND SITE
JENNINGS, JEFFERSON DAVIS PARISH, LOUISIANA
GENERAL NOTICE LETTER**

EVIDENTIARY DOCUMENTATION

Invoices and/or Marine Chemist Certificates

MARINE CHEMIST CERTIFICATE

SERIAL NO. B134856

W.O. 881

Steward Transp. Co.

1-11-85

SB4 SHIPYARD

Survey Requested by

Vessel Owner or Agent

Date

TC-20

TANK BARGE

SPA MORMENTALS

Vessel

Type of Vessel

Specific Location of Vessel

CRUDE OIL

WILCOB

3:30 PM

Last Three (3) Cargoes

Test Method

Time Survey Completed

ALL CARGO TANKS (1-SPES) AFTER RAKE

SAFE FOR WORKERS

SAFE FOR HOT WORK

AIR BLOWER REQUIRED

IN WORK TANK (MIN 1000 CFM)

CARGO LINE & DEEP WELL PUMP - OPEN & DRAIN

STEAM COILS

AIR BLOWN, SAFE FOR HOT WORK

FORWARDED RAKE

OTO LEL, SOME COATING,
SCOPE IN WAY OF WORK,
HAVE FIRE WATCH WITH
CHARGED FIRE HOSE, THEN
SAFE FOR WORKERS
SAFE FOR HOT WORK

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

QUALIFICATIONS: Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or release of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

STANDARD SAFETY DESIGNATIONS (partial list, paraphrased from NFPA 306-1980, Subsections 1-6 1 through 1-6 4, and Subsection 5-3 2).

SAFE FOR WORKERS: Means that in the compartment or space so designated, (a) the oxygen content of the atmosphere is at least 19.5 percent by volume; and that, (b) toxic materials in the atmosphere are within permissible concentrations; and that, (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate.

NOT SAFE FOR WORKERS: Means that in the compartment or space so designated, (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of the following:

SAFE FOR HOT WORK: Means that in the compartment so designated; (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of the following:

SERIAL NO. B134501

SAH S.Y. STEWART TANKERS INC. 5-8-85
Survey Requested by Vessel Owner or Agent Date
ELIZABETH S. TANKER SBA S.E. Gulf of Mexico
Vessel Type of Vessel Specific Location of Vessel
Hazardous Low Speed 11:15 AM
Last Three (3) Cargoes Test Method Time Survey Completed

BOW RAKE - HYDRAULIC STA ON DECK - SAFE FOR WORKERS

CARGO TANKS
1-2-3-4-5 P/S - 0% LEL - ASPHALT BOTTOMS - SAFE FOR WORKERS
SAFE FOR HOTWORK FOR DECK PENETRATIONS
WITH FIREWATER AND MISC. FIRE HOSE
ON STAND-BY

WING VOID D.B.
No. 1 P/S - 0% LEL - ASPHALT 3 TMS - SAFE FOR WORKERS
No. 1 S - 0% LEL - SOME HEAVY COIL ON BOTTOM - SAFE FOR WORKERS

No. 2 P/S - 0% LEL - COAL TAR BOTTOMS - VENTILATION NEEDED
FOR ENTRY

PUMP ROOM - SAFE FOR WORKERS - COFFERDAM #1 - SAFE FOR WORKERS

DOUBLE BOTTOM & PUMP ROOM - SAFE FOR HOTWORK TO BE USED
SUPPORT FOR DRILL ON EXTERNAL BOTTOM SHELL PLATE
FIRE WATCH WITH CHARGED FIRE HOSE READ. ON STAND-BY

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

QUALIFICATIONS: Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipelines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or release of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

STANDARD SAFETY DESIGNATIONS (partial list, paraphrased from NFPA 306-1980, Subsections 1-6.1 through 1-8.4, and Subsection 5-3.2).

SAFE FOR WORKERS: Means that in the compartment or space so designated: (a) the oxygen content of the atmosphere is at least 19.5 percent by volume; and that, (b) toxic materials in the atmosphere are within permissible concentrations; and that, (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate.

NOT SAFE FOR WORKERS: Means that in the compartment or space so designated, the requirements of Safe for Workers has not been met.

SAFE FOR HOT WORK: Means that in the compartment so designated: (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inerted spaces or where external hot work is to be performed; and that, (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit; and that, (c) the residues are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire, and while maintained as directed on the Marine Chemist's Certificate; and further, that, (d) all adjacent spaces containing or having contained flammable or combustible materials have been cleaned sufficiently to prevent the spread of fire, or are satisfactorily inerted, or, in the case of fuel tanks or lube oil tanks or engine room or fire room bilges, have been treated in accordance with the Marine Chemist's requirements.

NOT SAFE FOR HOT WORK: Means that in the compartment so designated, the requirements of Safe for Hot Work have not been met.

SAFE FOR REPAIR YARD ENTRY: Means that the compartments and spaces of the flammable cryogenic liquid carrier so designated: (a) have been tested by sampling at remote sampling stations, and results indicate the atmosphere to be above 19.5 percent oxygen, and less than 10 percent of the lower flammable limit, or (b) are inerted.

CHEMIST'S ENDORSEMENT. This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 306-1980 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation.

The undersigned acknowledges receipt of this Certificate under Section 23 of NFPA 306-1980 and understands conditions and limitations under which it was issued.

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed [Signature] SAH 5/8/85 Signed [Signature] 571
Name Company Date Marine Chemist Certificate No.

NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS

Survey Requested by SAA S-V Vessel Owner or Agent STANDARD TRANSPORTATION CO. Date 1-7-87
Vessel STC 008 Type of Vessel TANK BARGE Specific Location of Vessel SBA / HANNING'S, LA.
Last Three (3) Cargoes ASPHALT Test Method O2 / LEL / VISUAL Time Survey Completed 4:15 PM

PORTABLE AIR VENTILATION REQUIRED IN WORK TANK.
BOW RAKE
STERN RAKE

AFTER HOT OIL TANKS P/S SAFE FOR WORKERS
AFTER DIESEL OIL TANKS P/S SAFE FOR HOTWORK

ENGINE - BOILER ROOM

DOUBLE BOTTOMS

No. 1 & 2 P/S - SAFE FOR WORKERS - SAFE FOR HOTWORK

CARGO TANKS - SAFE FOR WORKERS - SAFE FOR HOTWORK
No. 1-2-3-4 P/S FIREWATCH WITH CHARGED FIREHOSE
REQUIRED AT WORK LOCATION.

DECK HOT OIL TANK - OIL - NOT SAFE FOR HOTWORK

HOT OIL COILS - SAFE FOR HOTWORK

CARGO LINES - SAFE FOR HOTWORK TO BURN BOLTS AND DROP VALVES
AND THEN SAFE FOR HOTWORK ON LINES.

DEEP WELLS (2) - NOT SAFE FOR HOTWORK - ISOLATED -

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

QUALIFICATIONS: Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or reissue of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

STANDARD SAFETY DESIGNATIONS (partial list, paraphrased from NFPA 306 Subsections 1-6.1 through 1-6.4, and Subsection 5-3.2)

SAFE FOR WORKERS Means that in the compartment or space so designated (a) the oxygen content of the atmosphere is at least 19.5 percent by volume, and that, (b) toxic materials in the atmosphere are within permissible concentrations, and that, (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate

NOT SAFE FOR WORKERS: Means that in the compartment or space so designated, the requirements of Safe for Workers have not been met

SAFE FOR HOT WORK: Means that in the compartment so designated (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inerted spaces or where external hot work is to be performed; and that, (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit, and that, (c) the residues are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire, and while maintained as directed on the Marine Chemist's Certificate, and further, that, (d) all adjacent spaces containing or having contained flammable or combustible materials have been cleaned sufficiently to prevent the spread of fire, or are satisfactorily inerted, or, in the case of fuel tanks or lube oil tanks, or engine room or fire room bilges, have been treated in accordance with the Marine Chemist's requirements

NOT SAFE FOR HOT WORK: Means that in the compartment so designated, the requirements of Safe for Hot Work have not been met

SAFE FOR REPAIR YARD ENTRY Means that the compartments and spaces of the flammable cryogenic liquid carrier so designated (a) have been tested by sampling at remote sampling stations, and results indicate the atmosphere tested to be above 19.5 percent oxygen, and less than 10 percent of the lower flammable limit, or (b) are inerted

CHEMIST'S ENDORSEMENT. This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 306 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation

The undersigned acknowledges receipt of this Certificate under Section 2-3 of NFPA 306 and understands conditions and limitations under which it was issued

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed Louis Smachiel SBA 1-7-87 Signed James H. Jones 577
Company Date Marine Chemist Certificate No.

W. J. # 1105

SERIAL NO. D 104245

Survey Requested by SEA S.V.	Vessel Owner or Agent STEINMETZ TRANSPORT INC	Date 12-19-88
Vessel AUNTIE MARIE	Type of Vessel TANK BARGE	Specific Location of Vessel SEA JENNINGS
Last Three (3) Cargoes ASPHALT	Test Method 02/122/USUAL	Time Survey Completed 10:30 AM

BAR BARGE — 0% LEL SAFE FOR WORKERS
LOOSE MAGNETITE ON BOTTOM

CARGO TANKS
No. 1-2-3-4-5 P/B — SAFE FOR WORKERS
SAFE FOR HOTWORK TO BURN HOLES
IN DECK WITH FIRE RETARDANT
CLOTH UNDER ALTAIR TO CATCH FIRE AND
FIREWATCH WITH CHARGED FIRE-TRUCK ON
STAND-BY.

PUMP ROOM — LOOSE SOFT ASPHALT — 0% LEL
CHESTERDALE — SOFT ASPHALT ON BOTTOM — 0% LEL
WING UNITS No. 1-2-3 P/B — SOFT ASPHALT ON BOTTOM — 0% LEL

DOUBLE BOTTOMS — CLOSED & SECURED

FUEL TANKS — FULL

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

QUALIFICATIONS: Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or relapse of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

STANDARD SAFETY DESIGNATIONS (partial list, paraphrased from NFPA 306 Subsections 1-61 through 1-64, and Subsection 5-32)

SAFE FOR WORKERS Means that in the compartment or space so designated (a) the oxygen content of the atmosphere is at least 19.5 percent by volume, and that, (b) toxic materials in the atmosphere are within permissible concentrations, and that, (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate

NOT SAFE FOR WORKERS. Means that in the compartment or space so designated, the requirements of Safe for Workers have not been met

SAFE FOR HOT WORK Means that in the compartment so designated, (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inerted spaces or where external hot work is to be performed, and that, (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit, and that, (c) the residues are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire, and while maintained as directed on the Marine Chemist's Certificate; and further, that, (d) all adjacent spaces containing or having contained flammable, or combustible materials have been cleaned sufficiently to prevent the spread of fire, or are satisfactorily inerted, or, in the case of fuel tanks or lube oil tanks, or engine room or fire room bilges, have been treated in accordance with the Marine Chemist's requirements

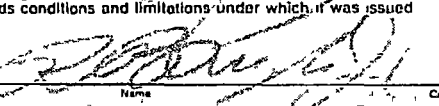
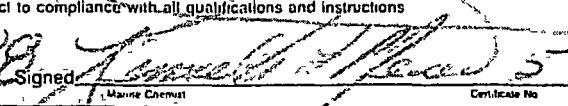
NOT SAFE FOR HOT WORK Means that in the compartment so designated, the requirements of Safe for Hot Work have not been met

SAFE FOR REPAIR YARD ENTRY. Means that the compartments and spaces of the flammable cryogenic liquid carrier so designated, (a) have been tested by sampling at remote sampling stations, and results indicate the atmosphere tested to be above 19.5 percent oxygen and less than 10 percent of the lower flammable limit, or (b) are inerted

CHEMIST'S ENDORSEMENT. This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 306 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation

"The undersigned acknowledges receipt of this Certificate under Section 23 of NFPA 306 and understands conditions and limitations under which it was issued"

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions

Signed  Date **12/19/88** Signed  Certificate No. **577**

NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS

20M-4-86 Printed in USA

P.O. BOX 3602 BEAUMONT, TEXAS 77704
(409) 832-6409, 866-4822, 866-4223
W. B. HATAWAY 537 K. L. MERCER 577

MARINE CHEMIST CERTIFICATE

SERIAL NO. E 35458

Survey Requested by SBA SHIPYARD Vessel Owner or Agent 3-1-90 Date
Vessel ELIZABETH S Type of Vessel TANK BARGE Specific Location of Vessel SEABOARD MARINE
Last Three (3) Cargoes ACQUAINT, ACQUAINT, 6 OIL Tests Performed DEILED / VULCAN Time Survey Completed 11:00 AM

BOW RAKE - SAFE FOR WORKERS - SAFE FOR HOTWORK
FIREWATCH AND CHARGED FIREHOSE REQ'D.
NO. 1 STD WING DOUBLE BOTTOM - SAFE FOR WORKERS - SAFE FOR HOTWORK
WING DOUBLE BOTTOMS
NO. 1 PORT, 2 PORT/STD, 3 PORT/STD - SAFE FOR WORKERS
NOT SAFE FOR HOTWORK
CARGO TANKS
NO. 1 P/S, 2 P/S, 3 P/S, 4 P/S, 5 S - SAFE FOR WORKERS
NOT SAFE FOR HOTWORK
CARGO TANK # 5P } SAFE FOR WORKERS
PORT DRAIN ON TANK } SAFE FOR HOTWORK
WATER BOTTOM ON 5P CARGO TANK.
ENGINE ROOM - SAFE FOR HOTWORK / FIREWATCH REQUIRED.
PUMP ROOM - SAFE FOR WORKERS / NOT SAFE FOR HOTWORK
COFFERDAMS - P, S, S - SAFE FOR WORKERS / NOT SAFE FOR HOTWORK
COFFERDAM - P - SAFE FOR WORKERS / SAFE FOR HOTWORK.

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

QUALIFICATIONS: Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or reissue of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

STANDARD SAFETY DESIGNATIONS (partial list, paraphrased from NFPA 306 Subsections 2-3.1 through 2-3.5, and Subsection 6-3.2)

SAFE FOR WORKERS Means that in the compartment or space so designated (a) the oxygen content of the atmosphere is at least 19.5 percent by volume, and that, (b) toxic materials in the atmosphere are within permissible concentrations, and that, (c) the residues are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate

NOT SAFE FOR WORKERS Means that in the compartment or space so designated, the requirements of Safe for Workers have not been met

ENTER WITH RESTRICTIONS Means that in any compartment or space so designated, entry for work may be made only if conditions of proper protective equipment, clothing, and time are as specified

SAFE FOR HOT WORK Means that in the compartment so designated (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inerted spaces or where external hot work is to be performed, and that, (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit, and that, (c) the residues are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire, and while maintained as directed on the Marine Chemist's Certificate, and further, that, (d) all adjacent spaces containing or having contained flammable or combustible materials have been cleaned sufficiently to prevent the spread of fire, or are satisfactorily inerted, or, in the case of fuel tanks or lube oil tanks, or engine room or fire room bilges, have been treated in accordance with the Marine Chemist's requirements

NOT SAFE FOR HOT WORK Means that in the compartment so designated, the requirements of Safe for Hot Work have not been met

SAFE FOR REPAIR YARD ENTRY Means that the compartments and spaces of the flammable cryogenic liquid carrier so designated (a) have been tested by sampling at remote sampling stations, and results indicate the atmosphere tested to be above 19.5 percent oxygen, and less than 10 percent of the lower flammable limit, or (b) are inerted

CHEMIST'S ENDORSEMENT. This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 306 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation

The undersigned acknowledges receipt of this Certificate under Section 2-6 of NFPA 306 and understands conditions and limitations under which it was issued

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions

Signed W. B. Hataway SBA 3-1-90 W. B. Hataway 577
Name Company Date Marine Chemist Certificate No

NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS

MARINE CHEMISTS, INC. OF TEXAS
P.O. BOX 3602 BEAUMONT, TEXAS 77704
(409) 832-6409, 866-4822, 866-4223
K. B. HATAWAY 537 K. L. MERCEP 577

MARINE CHEMIST CERTIFICATE
SERIAL NO. E 54817

Survey Requested by SEA SHIPYARD Date 3-1-90
Vessel ELIZABETH S Vessel Owner or Agent W.O. HISS
Type of Vessel TANK BARGE Specific Location of Vessel SEA MONTANA
Last Three (3) Cargoes ASPHALT Tests Performed 0-100% INERT Time Survey Completed 4:30 PM

DET. PUMP ROOM

SAFE FOR WORKERS

FOREPEAK

SAFE FOR HOT WORK

C/PAIN LOCKER

FIREWATCH WITH CHARGED

PORT AFT ELECT. TANK

FIREHOSE REQUIRED

CARGO TANKS 3PAS, 5P

WITH WATER OVER

HARD ASPHALT

SAFE FOR HOT WORK

SAFE FOR WORKERS

CARGO TANKS 1PAS, 2PAS, 4PAS, 5P

HARD ASPHALT

SAFE FOR HOT WORK

WITH WATER BOTTOM

SAFE FOR WORKERS

WING DOUBLE BOTTOMS 1S, 3S

WITH FIREWATCH CHARGED

FIREHOSE

SAFE FOR WORKERS

SAFE FOR HOT WORK

WING DOUBLE BOTTOMS #1 P, 2PAS, 3P

SOME RESIDUE WITH AIR

VENT (MIN. 1000 CFM)

SAFE FOR WORKERS

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

QUALIFICATIONS: Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or release of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

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NOT SAFE FOR HOT WORK: Means that in the compartment so designated, the requirements of Safe for Hot Work have not been met.

SAFE FOR REPAIR YARD ENTRY: Means that the compartments and spaces of the flammable cryogenic liquid carrier so designated (a) have been tested by sampling at remote sampling stations, and results indicate the atmosphere tested to be above 19.5 percent oxygen and less than 10 percent of the lower flammable limit or (b) are inerted.

CHEMIST'S ENDORSEMENT: This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 306 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation.

The undersigned acknowledges receipt of this Certificate under Section 2.6 of NFPA 306 and understands conditions and limitations under which it was issued.

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed _____

Name

Company

Date

Signed _____

Marine Chemist

Certificate No.

NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS

MARINE CHEMISTS, INC. OF TEXAS
P.O. BOX 3602 BEAUMONT, TEXAS 77704
(409) 832-6409, 866-4822, 866-4223
W. B. HATWAY 537 K. L. MERCER 577

MARINE CHEMIST CERTIFICATE

SERIAL NO. E 35491

Survey Requested by STEWART TRANSPORTATION Date 7-16-90
Vessel Owner or Agent
Vessel ELIZABETH S Type of Vessel TANK BARGE Specific Location of Vessel SPRAT TOWNSHIP LA.
Last Three (3) Cargoes HEAVY OIL Tests Performed ON 11/12/1 USUAL Time Survey Completed 12:15 PM

STBD FUEL OIL TANK SAFE FOR WORKERS
SAFE FOR HOT WORK
FORCED AIR VENTILATION REQD. (MIN. 500 CFM)

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

QUALIFICATIONS: Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or reissue of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

STANDARD SAFETY DESIGNATIONS (partial list, paraphrased from NFPA 306 Subsections 2-3.1 through 2-3.5, and Subsection 6-3.2)

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NOT SAFE FOR WORKERS Means that in the compartment or space so designated, the requirements of Safe for Workers have not been met.

ENTER WITH RESTRICTIONS Means that in any compartment or space so designated, entry for work may be made only if conditions of proper protective equipment, clothing, and time are as specified.

SAFE FOR HOT WORK Means that in the compartment so designated (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inerted spaces or where external hot work is to be performed, and that, (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit, and that, (c) the residues are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire, and while maintained as directed on the Marine Chemist's Certificate, and further, that, (d) all adjacent spaces containing or having contained flammable or combustible materials have been cleaned sufficiently to prevent the spread of fire, or are satisfactorily inerted, or, in the case of fuel tanks or lube oil tanks, or engine room or fire room bilges, have been treated in accordance with the Marine Chemist's requirements.

NOT SAFE FOR HOT WORK Means that in the compartment so designated, the requirements of Safe for Hot Work have not been met.

SAFE FOR REPAIR YARD ENTRY Means that the compartments and spaces of the flammable cryogenic liquid carrier so designated (a) have been tested by sampling at remote sampling stations, and results indicate the atmosphere tested to be above 19.5 percent oxygen, and less than 10 percent of the lower flammable limit, or (b) are inerted.

CHEMIST'S ENDORSEMENT. This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 306 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation.

The undersigned acknowledges receipt of this Certificate under Section 2-6 of NFPA 306 and understands conditions and limitations under which it was issued.

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed [Signature] Date 3/16/90 Signed [Signature] Marine Chemist
Name Company Date Certificate No.

NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS

MARINE CHEMISTS, INC. OF TEXAS
P.O. BOX 3602 BEAUMONT, TEXAS 77704
(409) 832-6409 866-4822, 866-4223 WIG 1155
W. B. HATWAY, 537 K. L. MERCER 577

MARINE CHEMIST CERTIFICATE

SERIAL NO. E 55313

Survey Requested by SRA 3-V Date 7-21-90
Vessel ELIZABETH S Vessel Owner or Agent STUART TRANS
Type of Vessel TANK BARGE Specific Location of Vessel SRAT TANKERS
Last Three (3) Cargoes WALSHIT Tests Performed On-Hold 11 hours Time Survey Completed 3:50 PM

Living Void Double Bottoms
No. 1 P, 2 P, 3 P SAFE FOR WORKERS
SAFE FOR HOTWORK
FIREWATCH AND CHARGED FIRE HOSE REQ'D.
FORCED AIR VENTILATION REQ'D. (MIN. 100 CFM)
Living Void Double Bottom
No. 2 S SAFE FOR HOTWORK
FIREWATCH AND CHARGED FIRE HOSE REQUIRED.
- ENTER WITH RESTRICTIONS -
ORGANIC VAPOR RESPIRATOR REQ'D.
FORCED AIR VENTILATION REQ'D. (MIN. 100 CFM)

Stewart Transpart

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

QUALIFICATIONS: Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or reissue of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

STANDARD SAFETY DESIGNATIONS (partial list, paraphrased from NFPA 306 Subsections 2-3.1 through 2-3.5, and Subsection 6-3.2)

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NOT SAFE FOR WORKERS. Means that in the compartment or space so designated, the requirements of Safe for Workers have not been met.

ENTER WITH RESTRICTIONS. Means that in any compartment or space so designated entry for work may be made only if conditions of proper protective equipment, clothing, and time are as specified.

SAFE FOR HOT WORK. Means that in the compartment so designated (a) oxygen content of the atmosphere is at least 19.5 percent by volume with the exception of inerted spaces or where external hot work is to be performed, and that (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit, and that (c) the residues are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire, and while maintained as directed on the Marine Chemist's Certificate, and further, that (d) all adjacent spaces containing or having contained flammable or combustible materials have been cleaned sufficiently to prevent the spread of fire, or are satisfactorily inerted, or, in the case of fuel tanks or tube oil tanks, or engine room or fire room bulges, have been treated in accordance with the Marine Chemist's requirements.

NOT SAFE FOR HOT WORK. Means that in the compartment so designated the requirements of Safe for Hot Work have not been met.

SAFE FOR REPAIR YARD ENTRY. Means that the compartments and spaces of the flammable cryogenic liquid carrier so designated, (a) have been tested by sampling at remote sampling stations, and results indicate the atmosphere tested to be above 19.5 percent oxygen, and less than 10 percent of the lower flammable limit, or (b) are inerted.

CHEMIST'S ENDORSEMENT. This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 308 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation.

The undersigned acknowledges receipt of this Certificate under Section 2.6 of NFPA 308 and understands conditions and limitations under which it was issued.

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed Ronald W. Hatway SRA 3-21-90 Date 7-21-90 Signed Stewart Transpart Marine Chemist 577 Certificate No. 55313

NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS.

20M-2-88

Printed in U.S.A.

CUSTOMER COPY

MARINE CHEMISTS, INC. OF TEXAS
P.O. BOX 3602 BEAUMONT, TEXAS 77704
(409) 832-6409, 866-4822, 866-4223
W. D. FATAHAL 557 K. L. HERCOT 577 1001/76

MARINE CHEMIST CERTIFICATE

SERIAL NO. E 55214

Survey Requested by <u>SBA S/A</u>	Vessel Owner or Agent <u>STEWART TANK</u>	Date <u>8-28-90</u>
Vessel <u>AUNTIE MAE</u>	Type of Vessel <u>TANK BARGE</u>	Specific Location of Vessel <u>SPA MELMONT</u>
Last Three (3) Cargoes <u>ACADEMY (3)</u>	Tests Performed <u>COLLECT VISUAL</u>	Time Survey Completed <u>2:30 PM</u>

FOR IDEAL ———— SAFE FOR WORKERS
NO. 1 & 2 DOUBLE BOTTOMS ———— SAFE FOR HOT WORK
AIR VENT. (MIL 5000 PSI) PERMITS ————

NO. 1 PAS. LIVING TANKS ———— GENERALLY CLEAN, HAVE
FORWARD COFFER DAM ———— ENTER WITH CAUTION
FOR HOSE ON STANDING, THEN
SAFE FOR WORKERS
SAFE FOR HOT WORK

AFTER DUMP ROOMS ———— HIGH WATER BOTTOM,
SAFE FOR WORKERS
SAFE FOR HOT WORK
ON KEEL ROSS

MAIN DECK ———— SAFE FOR HOT WORK
ABOVE MAIN DECK ————

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

QUALIFICATIONS. Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or release of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

STANDARD SAFETY DESIGNATIONS (partial list, paraphrased from NFPA 306 Subsections 2-3.1 through 2-3.5, and Subsection 6-3.2)

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NOT SAFE FOR HOT WORK. Means that in the compartment so designated, the requirements of Safe for Hot Work have not been met.

SAFE FOR REPAIR YARD ENTRY. Means that the compartments and spaces of the flammable cryogenic liquid carrier so designated (a) have been tested by sampling at remote sampling stations and results indicate the atmosphere tested to be above 19.5 percent oxygen, and less than 10 percent of the lower flammable limit, or (b) are inerted.

CHEMIST'S ENDORSEMENT. This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 306 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation.

"The undersigned acknowledges receipt of this Certificate under Section 2-6 of NFPA 306 and understands conditions and limitations under which it was issued."

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed <u>W. D. Fatahal</u> SBA 8-28-90	Signed <u>W. D. Fatahal</u> 8-28-90
_____ Name	_____ Name
_____ Company	_____ Company
_____ Date	_____ Date
_____ Marine Chemist	_____ Marine Chemist

NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS.

MARINE CHEMISTS, INC. OF TEXAS
P.O. BOX 3602 BEAUMONT, TEXAS 77704
(409) 832-6409 / 866-4822, 866-4223
W. B. HATAKEY 527 R. E. NEPCER 577

MARINE CHEMIST CERTIFICATE

SERIAL NO. E 55228

Survey Requested by SBA Sky Vessel Owner or Agent STERNART Date 8-27-90
Vessel AUNTE MAME Type of Vessel TANK BARGE Specific Location of Vessel SRA MENTHATON
Last Three (3) Cargoes ASPHALT (S) Tests Performed O.I.C. / VISUAL / PHOSPHOR Time Survey Completed 12 NOON

ALL CARGO TANKS 1145 WIDE RECALL, 1145
2115, 30 AIR VENT (MAIN 1000CTN)
4145, 5145 SAFE FOR WORKERS
FOR INSPECTION
NO DETECTABLE BENZENE

NO. 1 P.K. WING TANKS AREA WIPED IN CARGO TANKS
NO. 1 P.K. CARGO TANKS 1 PLACE IN TANK CARGO TANK
NO. 2 P.K. WING TANKS WITH FILLER WITH CHARGES
NO. 2 P. CARGO TANK FIRE HOSE IN EACH WORK TANK
(EQUIPED AREAS) SAFE FOR WORKERS
(PORT SIDE) SAFE FOR HOT WORK

NO. 3 CARGO ONLY CARGO AREA SAFE FOR HOT WORK
(EQUIPED AREAS) OVERHEAD ON 2 PAVING
(PORT SIDE) SAFE FOR HOT WORK ON STATION

NO. 3 PORT WING SAFE FOR HOT WORK
TO INSTALL INSERT AT TANK
TOP AROUND MANHOLE

NO. 2 PORT WING HAS WATER BOTTOM UP TO AWAITS

STRD SERG SAFE FOR HOT WORK

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces, or if in any doubt, immediately stop all work and contact the undersigned Marine Chemist.

QUALIFICATIONS: Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or release of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed appurtenances shall be considered "not safe" unless otherwise specifically designated.

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CHEMIST'S ENDORSEMENT: This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 306 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation.

The undersigned acknowledges receipt of this Certificate under Section 2-6 of NFPA 306 and understands conditions and limitations under which it was issued.

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed Kevin Marshall SBA Date 8-27-90 Signed W.B. Hatakey Date 8-27-90
Name Company Date Marine Chemist Certificate No.

NOTE: THIS CERTIFICATE IS VALID ONLY ON MARINE VESSELS.

SERIAL NO. F 23837

Printed in U.S.A.

ENCLOSURE B

**SBA SHIPYARD SUPERFUND SITE
JENNINGS, JEFFERSON DAVIS PARISH, LOUISIANA
GENERAL NOTICE LETTER**

SMALL BUSINESS RESOURCES FACT SHEET



Office of Enforcement and Compliance Assurance
INFORMATION SHEET

U. S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance and tools to assist you in complying with federal and state environmental laws. These resources can help you understand your environmental obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

Hotlines, Helplines and Clearinghouses

EPA sponsors approximately 89 free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements.

The National Environmental Compliance Assistance Clearinghouse provides quick access to compliance assistance tools, contacts, and planned activities from the U.S. EPA, states, and other compliance assistance providers.
www.epa.gov/clearinghouse

Pollution Prevention Clearinghouse
www.epa.gov/opptintr/library/ppicindex.htm

EPA's Small Business Ombudsman Hotline provides regulatory and technical assistance information.
(800) 368-5888

Emergency Planning and Community Right-To-Know Act
(800) 424-9346

National Response Center (to report oil and hazardous substance spills)
(800) 424-8802

Toxics Substances and Asbestos Information
(202) 554-1404

Safe Drinking Water
(800) 426-4791

Stratospheric Ozone Refrigerants Information
(800) 296-1996

Clean Air Technology Center
(919) 541-0800

Wetlands Helpline
(800) 832-7828

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. If you don't have access to the Internet at your business, many public libraries provide access to the Internet at minimal or no cost.

EPA's Home Page
www.epa.gov

Small Business Assistance Program
www.epa.gov/ttn/sbap

Compliance Assistance Home Page
www.epa.gov/compliance/assistance

Office of Enforcement and Compliance Assurance
www.epa.gov/compliance

Small Business Ombudsman
www.epa.gov/sbo

Innovative Programs for Environmental Performance
www.epa.gov/partners



Compliance Assistance Centers

In partnership with industry, universities, and other federal and state agencies, EPA has established Compliance Assistance Centers (Centers) that provide information targeted to industries with many small businesses. All Centers can be accessed at <http://www.assistancecenters.net>

Metal Finishing

(1-800-AT-NMFRC or www.nmfrc.org)

Printing

(1-888-USPNEAC or www.pneac.org)

Automotive Service and Repair

(1-888-GRN-LINK or www.ccar-greenlink.org)

Agriculture

(1-888-663-2155 or www.epa.gov/agriculture)

Printed Wiring Board Manufacturing

(1-734-995-4911 or www.pwbrc.org)

Chemical Industry

(1-800-672-6048 or www.chemalliance.org)

Transportation Industry

(1-888-459-0656 or www.transource.org)

Paints and Coatings

(1-800-286-6372 or www.paintcenter.org)

Construction Industry

(www.cicacenter.org)

Automotive Recycling Industry

(www.ecarcenter.org)

US / Mexico Border Environmental Issues

(www.bordercenter.org)

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information or call EPA's Small Business Ombudsman at (800)-368-5888 or visit the Small Business Environmental Homepage at <http://www.smallbiz-enviroweb.org>

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses. The Small Business Policy (<http://www.epa.gov/compliance/incentives/smallbusiness>) and

Audit Policy (<http://www.epa.gov/compliance/incentives/auditing>)

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an ombudsman ("SBREFA Ombudsman") and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. The SBREFA Ombudsman will annually rate each agency's responsiveness to small businesses. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System (NAICS) designation, number of employees or annual receipts, defined at 13 C.F.R. 121.201, in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community because the regulated community previously commented on its activities.

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act (SBREFA) or related provisions.

ENCLOSURE C

SBA SHIPYARD SUPERFUND SITE JENNINGS, JEFFERSON DAVIS PARISH, LOUISIANA PARTIES RECEIVING GENERAL NOTICE LETTER

Allied Towing
c/o Allied Towing Service LLC
Francis J Lobrano
Registered Agent for Allied Towing Service LLC
147 Keating Dr.
Belle Chasse, Louisiana 70037

Allied Towing
c/o Allied Towing Service LLC
12608 Hwy 23
Belle Chase, Louisiana 70037

Koppers Company Inc
c/o Beazer East Inc.
Jill M. Blundon
Registered Agent for Beazer East Inc
436 Seventh Ave.
Pittsburgh, Pennsylvania 15219

Koppers Company Inc
c/o Beazer East Inc.
99 Wood Ave South
Iselin, New Jersey 08830

Koppers Company Inc
c/o Beazer East, Inc.
1910 Cochran Rd., Suite 200
Pittsburgh, Pennsylvania 15220

Higman Marine Service
c/o Higman Services Corporation
CT Corporation System
Registered Agent for Higman Services Corporation
5615 Corporate Blvd , Suite 400B
Baton Rouge, Louisiana 70808

Higman Marine Service
c/o Higman Services Corporation
Attn: Legal Department
1980 Post Oak Blvd , Suite 1101
Houston, Texas 77056

Ingram Barge Co
CT Corporation System
Registered Agent for Ingram Barge Co.
5615 Corporate Blvd., Suite 400B
Baton Rouge, Louisiana 70808

Ingram Barge Co
4400 Harding Road
Nashville, Tennessee 37205

Hall-Buck Marine
c/o Kinder Morgan Bulk Terminals Inc
CT Corporation System
Registered Agent for Kinder Morgan Bulk Terminals Inc.
5615 Corporate Blvd , Suite 40B
Baton Rouge, Louisiana 70808

Hall-Buck Marine
c/o Kinder Morgan Bulk Terminals Inc
Attn: Legal Department
7116 Hwy 22
Sorrento, Louisiana 70778

Hollywood Marine Inc.,
c/o Kirby Inland Marine, LP
Registered Agent
d/b/a CSC-Lawyers Incorporating Service Company
211 E 7th Street, Suite 620
Austin, Texas 78701-3136

Hollywood Marine Inc
c/o Kirby Inland Marine LP
Corporation Service Co.
Registered Agent for Kirby Inland Marine LP
320 Somerulos St.
Baton Rouge, Louisiana 70802-6129

Hollywood Marine Inc
c/o Kirby Inland Marine LP
Attn: Legal Department
55 Waugh Dr , Suite 1000
Houston, Texas 77007

Steuart Transportation Company
Registered Agent
National Registered Agents, Inc , of MD
351 W Camden Street
Baltimore, Maryland 21201

Steuart Transportation Company
5454 Wisconsin Avenue, Suite 1600
Chevy Chase, Maryland 20815

Sabine Towing
c/o Sabine Towing & Transportation Co. Inc
CT Corporation System
Registered Agent for Sabine Towing & Transportation Co.
Inc
5615 Corporate Blvd Suite 400B
Baton Rouge, Louisiana 70808

Sabine Towing & Transportation Co. Inc.
c/o Sequa Corporation
Attn. Legal Department
300 Blaisdell Rd.
Orangeburg, New York 10962

Sun Oil Company
c/o Sunoco, Inc
Corporation Service Company
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1703 Laurel Street
Columbia, SC 29201

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c/o Sunoco, Inc
1735 Market Street, Suite LL
Philadelphia, Pennsylvania 19103

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